

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

KEILEE FANT, ROELIF CARTER, ALLISON
NELSON, HERBERT NELSON JR., ALFRED
MORRIS, ANTHONY KIMBLE, DONYALE
THOMAS, SHAMEIKA MORRIS, DANIEL
JENKINS, RONNIE TUCKER, TONYA
DEBERRY, *et al.*,

Plaintiffs,

vs.

THE CITY OF FERGUSON,

Defendant.

No. 4-15-CV-00253-AGF

**DECLARATION OF ALICE TSIER IN SUPPORT OF PLAINTIFFS' MOTION TO
CERTIFY CLASS ACTION**

1. My name is Alice Tsier, and I am one of the attorneys for the plaintiffs, Keilee Fant *et al.* I have personal knowledge of the facts stated in this declaration and if called as a witness could competently testify to their truth.

2. I submit this declaration in support of Keilee Fant's Motion to Certify Class Proceedings for (i) the proposed Declaratory and Injunctive Class, (ii) the proposed Pretrial Class and *Gerstein* Subclass, and (iii) the proposed Post-Judgment Class.

3. For the convenience of the Court and the parties, all documentary exhibits included in this declaration have been Bates numbered. Documents with Bates numbers beginning with the prefix "FERG" were produced by the City of Ferguson, but were not Bates numbered upon production. Plaintiffs have since applied Bates numbers to these documents.

4. Attached hereto as Exhibit A is a true and correct copy of Bates No. 021991, an arrest record for Ms. Keilee Fant produced from Regional Justice Information System [REJIS] by the City of Ferguson.

5. Attached hereto as Exhibit B is a true and correct copy of Bates No. 022255, an arrest record for Mr. Roelif Carter produced from Regional Justice Information System [REJIS] by the City of Ferguson.

6. Attached hereto as Exhibit C is a true and correct copy of Bates No. 021686, an arrest record for Mr. Donyale Thomas produced from Regional Justice Information System [REJIS] by the City of Ferguson.

7. Attached hereto as Exhibit D is a true and correct copy of Bates No. 021759, an arrest record for Mr. Herbert Nelson produced from Regional Justice Information System [REJIS] by the City of Ferguson.

8. Attached hereto as Exhibit E is a true and correct copy of Bates No. 021579, a screenshot from the City of Ferguson's production reflecting outstanding balances owed for Allison Nelson.

9. Attached hereto as Exhibit F is a true and correct copy of Bates Nos. 002698 - 99, an arrest record for Mr. Roelif Carter produced from Regional Justice Information System [REJIS] by the City of Ferguson.

10. Attached hereto as Exhibit G is a true and correct copy of Bates Nos. 012113 - 14, an arrest record for Mr. Roelif Carter produced from Regional Justice Information System [REJIS] by the City of Ferguson.

11. Attached hereto as Exhibit H is a true and correct copy of Bates Nos. 013823 - 24, an arrest record for Mr. Roelif Carter produced from Regional Justice Information System [REJIS] by the City of Ferguson.

12. Attached hereto as Exhibit I is a true and correct copy of Bates Nos. 017130 - 31, an arrest record for Mr. Roelif Carter produced from Regional Justice Information System [REJIS] by the City of Ferguson.

13. Attached hereto as Exhibit J is a true and correct copy of Bates No. 020663, an arrest record for Mr. Roelif Carter produced from Regional Justice Information System [REJIS] by the City of Ferguson.

14. Attached hereto as Exhibit K is a true and correct copy of Bates No. 022338, an excerpt of arrest records produced from ITI, by the City of Ferguson.

15. Attached hereto as Exhibit L is a true and correct copy of Bates Nos. 003995 - 97, an arrest record for Mr. Donyale Thomas produced from Regional Justice Information System [REJIS] by the City of Ferguson.

16. Attached hereto as Exhibit M is a true and correct copy of Bates Nos. 002461 - 62, an arrest record for Ms. Keilee Fant produced from Regional Justice Information System [REJIS] by the City of Ferguson.

17. Attached hereto as Exhibit N is a true and correct copy of Bates Nos. 018379 - 80, an arrest record for Ms. Keilee Fant produced from Regional Justice Information System [REJIS] by the City of Ferguson.

18. Attached hereto as Exhibit O is a true and correct copy of Bates Nos. 009764 - 65, an arrest record for Mr. Anthony Kimble produced from Regional Justice Information System [REJIS] by the City of Ferguson.

19. Attached hereto as Exhibit P is a true and correct copy of Bates Nos. 014941 - 42, an arrest record for Mr. Anthony Kimble produced from Regional Justice Information System [REJIS] by the City of Ferguson.

20. Attached hereto as Exhibit Q is a true and correct copy of Bates Nos. 002923 - 24, an arrest record for Mr. Alfred Morris produced from Regional Justice Information System [REJIS] by the City of Ferguson.

21. Attached hereto as Exhibit R is a true and correct copy of Bates Nos. 004596 - 97, an arrest record for Mr. Alfred Morris produced from Regional Justice Information System [REJIS] by the City of Ferguson.

22. Attached hereto as Exhibit S is a true and correct copy of Bates Nos. 006466 - 67, an arrest record for Mr. Alfred Morris produced from Regional Justice Information System [REJIS] by the City of Ferguson.

23. Attached hereto as Exhibit T is a true and correct copy of Bates Nos. 011653 - 011654, an arrest record for Mr. Alfred Morris produced from Regional Justice Information System [REJIS] by the City of Ferguson.

24. Attached hereto as Exhibit U is a true and correct copy of Bates No. 011828, an arrest record for Ms. Allison Nelson produced from Regional Justice Information System [REJIS] by the City of Ferguson.

25. Attached hereto as Exhibit V is a true and correct copy of Bates No. 014541, an arrest record for Ms. Allison Nelson produced from Regional Justice Information System [REJIS] by the City of Ferguson.

26. Attached hereto as Exhibit W is a true and correct copy of Bates Nos. 019026 - 27, an arrest record for Ms. Allison Nelson produced from Regional Justice Information System [REJIS] by the City of Ferguson.

27. Attached hereto as Exhibit X is a true and correct copy of Bates Nos. 019955 - 56, an arrest record for Mr. Herbert Nelson produced from Regional Justice Information System [REJIS] by the City of Ferguson.

28. Attached hereto as Exhibit Y is a true and correct copy of Bates Nos. 012739 - 40, an arrest record for Mr. Ronnie Tucker produced from Regional Justice Information System [REJIS] by the City of Ferguson.

29. Attached hereto as Exhibit Z is a true and correct copy of Bates No. 022413, an excerpt of arrest records produced from ITI, by the City of Ferguson.

30. Attached hereto as Exhibit AA is a true and correct copy of Bates No. 022369, an excerpt of arrest records produced from ITI, by the City of Ferguson.

31. Attached hereto as Exhibit AB is a true and correct copy of Bates Nos. 019869 - 70, an arrest record for Ms. Keilee Fant produced from Regional Justice Information System [REJIS] by the City of Ferguson.

32. Attached hereto as Exhibit AC is a true and correct copy of Bates No. 002460, an arrest record for Mr. Anthony Kimble produced from Regional Justice Information System [REJIS] by the City of Ferguson.

33. Attached hereto as Exhibit AD is a true and correct copy of Bates No. 001513, an arrest record for Mr. Alfred Morris produced from Regional Justice Information System [REJIS] by the City of Ferguson.

34. Attached hereto as Exhibit AE is a true and correct copy of Bates Nos. 010041 - 42, an arrest record for Mr. Alfred Morris produced from Regional Justice Information System [REJIS] by the City of Ferguson.

35. Attached hereto as Exhibit AF is a true and correct copy of Bates Nos. 014486 - 87, an arrest record for Mr. Alfred Morris produced from Regional Justice Information System [REJIS] by the City of Ferguson.

36. Attached hereto as Exhibit AG is a true and correct copy of Bates Nos. 002784 - 85, an arrest record for Ms. Shameika Morris produced from Regional Justice Information System [REJIS] by the City of Ferguson

37. Attached hereto as Exhibit AH is a true and correct copy of Bates Nos. 005156 - 58, an arrest record for Ms. Shameika Morris produced from Regional Justice Information System [REJIS] by the City of Ferguson.

38. Attached hereto as Exhibit AI is a true and correct copy of Bates No. 010575, an arrest record for Ms. Shameika Morris produced from Regional Justice Information System [REJIS] by the City of Ferguson.

39. Attached hereto as Exhibit AJ is a true and correct copy of Bates Nos. 005956 - 57, an arrest record for Mr. Herbert Nelson produced from Regional Justice Information System [REJIS] by the City of Ferguson.

40. Attached hereto as Exhibit AK is a true and correct copy of Bates No. 008893, an arrest record for Mr. Herbert Nelson produced from Regional Justice Information System [REJIS] by the City of Ferguson.

41. Attached hereto as Exhibit AL is a true and correct copy of Bates Nos. 018307 - 08, an arrest record for Mr. Herbert Nelson produced from Regional Justice Information System [REJIS] by the City of Ferguson.

42. Attached hereto as Exhibit AM is a true and correct copy of the Department of Justice Report on its Investigation of the Ferguson Police Department, dated March 4, 2015.

43. Attached hereto as Exhibit AN is a true and correct copy of Bates No. FERG-00000001, [REDACTED]

44. Attached hereto as Exhibit AO is a true and correct copy of the Bates No. FERG-00000002 - 03, [REDACTED]
[REDACTED]

45. Attached hereto as Exhibit AP is a true and correct copy of Bates No. FERG-00000004, [REDACTED]

46. Attached hereto as Exhibit AQ is a true and correct copy of Bates Nos. 0394 - 0396, General Order § 421 of the Ferguson Police Department.

47. Attached hereto as Exhibit AR is a true and correct copy of Bates No. FERG-00000005, [REDACTED]
[REDACTED]

48. Attached hereto as Exhibit AS is a true and correct copy of Bates No. 022047, the Warrant for Failure to Appear for Keilee Fant, [REDACTED]

49. Attached hereto as Exhibit AT is a true and correct copy of Bates Nos. 0483 - 0489, General Order § 454 of the Ferguson Police Department.

50. Attached hereto as Exhibit AU are true and correct copies of 100 arrest records excerpted from the Regional Justice Information System [REJIS], produced by the City of Ferguson.

51. Attached hereto as Exhibit AV are true and correct copies of 84 arrest records excerpted from the Regional Justice Information System [REJIS], produced by the City of Ferguson.

52. Attached hereto as Exhibit AW is a true and correct copy of Bates Nos. 001633 - 34, and 002167 - 68, the arrest records for [REDACTED] produced from Regional Justice Information System [REJIS] by the City of Ferguson.

53. Attached hereto as Exhibit AX is a true and correct copy of Bates Nos. 004055 - 56, 006876, 007188 - 89, 007359 - 60, and 007398 - 99, the arrest records for [REDACTED] produced from Regional Justice Information System [REJIS] by the City of Ferguson.

54. Attached hereto as Exhibit AY are true and correct copies of 100 arrest records excerpted from the Regional Justice Information System [REJIS], produced by the City of Ferguson.

55. Attached hereto as Exhibit AZ is a true and correct copy of Bates No. FERG-00000006, [REDACTED]

56. Attached hereto as Exhibit BA is a true and correct copy of Bates Nos. 0358 - 0371, General Order § 416 of the Ferguson Police Department.

57. Attached hereto as Exhibit BB is a true and correct excerpted copy of Bates No. 022257, the Authorization for Prisoner Early-Release for Roelif Carter, [REDACTED]

58. Attached hereto as Exhibit BC is a true and correct copy of Bates No. FERG-00000007, Warrant for Failure to Appear [REDACTED]

59. Attached hereto as Exhibit BD is a true and correct copy of Bates No. FERG-00000008, Warrant for Failure to Appear [REDACTED]

60. Attached hereto as Exhibit BE is a true and correct copy of Bates No. FERG-00000009, Warrant for Failure to Appear [REDACTED]

61. Attached hereto as Exhibit BF is a true and correct copy of Bates No. FERG-00000010, Warrant for Failure to Appear [REDACTED]

62. Attached hereto as Exhibit BG is a true and correct copy of Bates No. FERG-00000011, Warrant for Failure to Appear [REDACTED]

63. Attached hereto as Exhibit BH is a true and correct copy of Bates No. FERG-00000012, Warrant for Failure to Appear [REDACTED]

64. Attached hereto as Exhibit BI is a true and correct copy of Bates No. FERG-00000013, Warrant for Failure to Appear [REDACTED]

65. Attached hereto as Exhibit BJ is a true and correct copy of Bates No. FERG-00000014, Warrant for Failure to Appear [REDACTED]

66. Attached hereto as Exhibit BK is a true and correct copy of Bates No. FERG-00000015, Warrant for Failure to Appear [REDACTED]

67. Attached hereto as Exhibit BL is a true and correct copy of Bates No. FERG-00000016, Warrant for Failure to Appear [REDACTED]

68. Attached hereto as Exhibit BM is a true and correct copy of excerpts from the deposition of Brian Kaminski, taken on January 13, 2016.

69. Attached hereto as Exhibit BN is a true and correct copy of excerpts from the deposition of Stephanie Karr, taken on May 13, 2016.

70. Attached hereto as Exhibit BO is a true and correct copy of excerpts from the deposition of Thomas Jackson, taken on January 6, 2016.

71. Attached hereto as Exhibit BP is a true and correct copy of excerpts from the deposition of Keilee Fant, taken on March 3, 2017.

72. Attached hereto as Exhibit BQ is a true and correct copy of excerpts from the deposition of Mary Ann Twitty, taken on January 11, 2017.

73. Attached hereto as Exhibit BR is a true and correct copy of excerpts from the deposition of William Catanzaro, taken on May 3, 2016.

74. Attached hereto as Exhibit BS is a true and correct copy of excerpts from the deposition of Ronnie Tucker, taken on April 19, 2017.

75. Attached hereto as Exhibit BT is a true and correct copy of excerpts from the deposition of Alfred Morris, taken on April 19, 2017.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge.

Respectfully submitted,

/s/ Alice Tsier
Alice Tsier (*pro hac vice*)
(E.D. Mo. Bar No. 5205885NY)
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